

1 BARRY J. PORTMAN
Federal Public Defender
2 ELIZABETH M. FALK
Assistant Federal Public Defender
3 19th Floor Federal Building
450 Golden Gate Avenue
4 San Francisco, CA 94102
(415) 436-7700
5
6 Counsel for Defendant CAMPBELL

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) No. CR 06-565 SI
11)
Plaintiff,) **STIPULATION TO CONTINUE STATUS**
12) **CONFERENCE**
v.)
13) Date: December 1, 2006
PRISCILLA HUNTER, et al.,) Time: 11:00 a.m.
14) Court: The Honorable Susan Illston
Defendants.)
15)

16 The parties hereby stipulate and request as follows:

- 17 1. A status conference is scheduled for December 1, 2006;
- 18 2. The parties respectfully request a continuance of the status conference, as the
19 electronic discovery process is not completed;
- 20 3. The status of discovery is as follows: the government and representatives from the
21 defense team met with CJA Panel Coordinator Jeanne DeKolver in early October
22 to discuss the method by which discovery would be produced in this case. It was
23 decided that all the discovery would be scanned, to avoid the cost of copying
24 216,000 pieces of paper. A proposal has been approved by the U.S. Attorney and
25 Ms. DeKolver, and the parties are waiting for the authorization of the Federal
26 Public Defender for 1/8 the cost of scanning the documents. Authorization is

1 anticipated by the end of the week from the Federal Public Defender, and the
2 funding request should be before this Court no later than early next week,
3 December 4-5, 2006;

4 4. The CJA Coordinator is also exploring document management software for use by
5 all defendants. She anticipates requesting funding from the Court for a web-based
6 document management program, and will continue to raise this issue with the
7 Court in the near future;

8 5. To provide defense counsel with a meaningful opportunity to receive the
9 discovery in this matter, implement discovery management software, conduct a
10 preliminary review of the documents and determine an appropriate schedule for
11 this case to proceed, the defendants respectfully request a two month continuance
12 of the status conference, to February 2, 2007, at 11:00 a.m.;

13 6. The government has no objection to a continuance of this matter, as indicated on
14 this stipulation;

15 7. The parties further agree and jointly request to order that time be excluded under
16 the Speedy Trial Act on the basis of effective preparation of counsel, as defense
17 counsel is not yet in possession of the discovery in this matter, and cannot assist
18 their clients made decisions about the course of this case without adequate time to
19 receive and review discovery, 18 U.S.C. § 3161(h)(8)(B)(iv).

20 IT IS HEREBY STIPULATED.
21

22 Dated: November 30, 2006

23 _____/S/
ELIZABETH M. FALK
ASSISTANT FEDERAL PUBLIC DEFENDER
Attorney for Michelle Campbell

24 _____/S/
25 DORAN WEINBERG
Attorney for Priscilla Hunter
26

/S/
GARRICK S. LEW
Attorney for Iris Martinez

/S/ _____
ERIK QUANDT
Attorney for Darlene Crabtree

/S/

LYDIA STIGLICH
Attorney for Allan Crabtree

/S/
JOHN JORDIN
Attorney for Michael Hunter

_____/S/_____
BOB WAGGENER
Attorney for Fred Naredp

/S/
STEVE TEICH
Attorney for Kathy Redhorse-Stallworth

Dated: November 29, 2006

/S/ _____
DAVE DENIER
ASSISTANT UNITED STATES ATTORNEY

[PROPOSED] ORDER

For the reasons set forth in this stipulation, and good cause shown, the status conference in the aforementioned case set for December 1, 2006 at 11:00 a.m. is hereby CONTINUED to February 2, 2007, at 11:00 a.m. For the reasons stated herein, it is further ORDERED that for the purpose of effective preparation of defense counsel, and for good cause shown, the ends of justice served by excluding the period of time from December 1, 2006 to February 2, 2007 outweigh the interest of the public and the defendant in a speedy trial, and as such, the period of

December 1, 2006 and February 2, 2007 is excluded from Speedy Trial Act calculations pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

IT IS SO ORDERED

DATED: _____



THE HONORABLE SUSAN ILLSTON
CHIEF UNITED STATES DISTRICT JUDGE